

### **REMARKS/ARGUMENTS**

Claims 1-20 remain pending, and no claim is amended in this response. Applicant respectfully requests reconsideration in light of the following remarks.

#### **Rejection of Claims 1-20 under 35 U.S.C. 103(a)**

Claims 1-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chowdhary (US Patent 6,675,278) in view of Ryan (US Patent 5,748,551), or further in view of Duncan (US Patent 5,832,213). Applicant respectfully traverses the rejection for the following reasons.

In the Response to Arguments of the outstanding office action, Examiner expresses disagreement about the Applicant's previous remarks. With regard to this, it is respectfully submitted that such disagreement is beside the point. What is contended in Applicant's previous remarks is requesting withdrawal of primary citation Chowdhary because this cited prior art teaches away which leads in a direction divergent from the path taken by Applicant, no matter whether Ryan discloses the claimed invention's features or not. Specifically, Chowdhary teaches mapping, or at least intending to map, blocks with adjacent logical addresses into blocks with adjacent physical addresses, as is evident from Figs. 3-5 and associated description. To the contrary, the purpose of the claimed invention is to map "logical adjacent block ... to be stored physically at different (non-adjacent) banks of the memory." As well established in the Patent Law, a cited prior art should be withdrawn if that prior art teaches away (from the claimed invention) in a direction divergent from the path taken by Applicant.

In the outstanding office action, Examiner asserts that "Ryan teaches "mapping to physical memory ... result in any logical adjacent block of data be stored physically at different banks of the memory." Applicant respectfully notes Examiner's improperly misrepresentation of Ryan's disclosure. Applicant respectfully submits that Ryan does not teach the claimed mapping step, as Ryan's disclosure is exclusively concerns with how commands are executed in memory arrays or banks on a time-staggered or pipeline basis, as described at column 3, lines 66-67 through column 4, lines 1-13:

... a memory device has an array of memory cells arranged in a plurality of subarrays, with each subarray having the memory cells arranged in rows and columns. Commands applied to the memory device affect all subarrays identically, but on a time-staggered basis provided for internal to the memory device. Command execution is initiated in a first of the subarrays, and a predetermined time later in a second of the subarrays, and so on until command execution is initiated in a last of the subarrays. After completed execution of a command in the first subarray, a subsequent command in a data transfer operation can be applied to the memory device, before completed execution of earlier commands in other subarrays. Thus, data transfer operations to and from the memory device can be executed continuously.

In addition to the lack of the mapping step as discussed above, Ryan does not teach the specific algorithm for mapping the “logical adjacent block ... to be stored physically at different banks of the memory” as in Claims 4, 9, 15, or 20. It is respectfully noted that the claimed specific mapping algorithm cannot be derived from Ryan that even does not teach a mapping.

With respect to dependent claims not specifically mentioned, it is submitted that these claims are patentable not only by virtue of their dependency on their respective base claims, but also for the totality of features recited therein. Cited prior art Duncan does not make up deficiency of Chowdhary or Ryan.

For the foregoing reasons, Applicant respectfully requests the withdrawal of the primary citation Chowdhary because of its teaching away from the claimed invention. Further, Ryan is considered insufficient for rejecting the claimed invention. Moreover, neither Ryan nor Chowdhary discloses the specific mapping algorithm.

**CONCLUSION**

In light of the above amendments and remarks, Applicant respectfully submits that Claims 1-20 as previously presented are in condition for allowance. Accordingly, reconsideration is respectfully requested.

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Respectfully submitted,

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